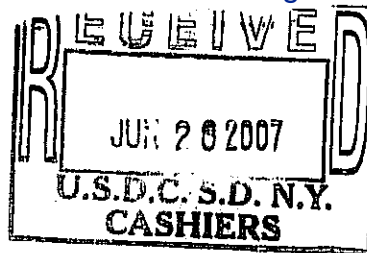


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**JUDGE McMAHON**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LARRY S. NELSON, SR.,

Plaintiff,

-against-

ROEHRIG MARITIME LLC and  
TUG TILLY LLC,

Defendants.

**'07 CIV 6037**

**PLAINTIFF DEMANDS  
A TRIAL BY JURY**

**COMPLAINT**

**SEAMAN'S CASE UNDER  
THE JONES ACT FOR  
PERSONAL INJURIES**

**SUITS UNDER SPECIAL RULE FOR SEAMEN TO  
SUE WITHOUT SECURITY OR PREPAYMENT OF  
FEES FOR THE ENFORCEMENT OF THE LAWS  
OF THE UNITED STATES, COMMON AND STAT-  
UTORY FOR THE PROTECTION OF AND FOR  
THE HEALTH AND SAFETY OF SEAMEN AT SEA**

Plaintiff, LARRY S. NELSON, SR., by his attorneys, FRIEDMAN &  
JAMES LLP, complaining of the defendants, ROEHRIG MARITIME LLC and TUG  
TILLY LLC, respectfully alleges upon information and belief as follows:

**FIRST COUNT AGAINST  
DEFENDANT ROEHRIG MARITIME LLC**

1. Upon information and belief, all times hereinafter mentioned,  
defendant ROEHRIG MARITIME LLC was and still is a corporation, or other business

organization, organized and existing under and by virtue of the laws of one of the States of the United States of America, and transacting business in the State of New York.

2. At all times and dates hereinafter mentioned, defendant ROEHRIG MARITIME LLC owned the Tug ANABELLE V. ROEHRIG.

3. At all times and dates hereinafter mentioned, defendant ROEHRIG MARITIME LLC operated the Tug ANABELLE V. ROEHRIG.

4. \_ At all times and dates hereinafter mentioned, defendant \_ ROEHRIG MARITIME LLC controlled the Tug ANABELLE V. ROEHRIG.

5. That at all times and dates hereinafter mentioned, the plaintiff was a member of the crew of the Tug ANABELLE V. ROEHRIG and an employee of defendant ROEHRIG MARITIME LLC.

6. That on or about February 1, 2005, without any fault on the part of the plaintiff, and wholly and solely by reason of the negligence, recklessness and carelessness of defendant ROEHRIG MARITIME LLC, and its agents, servants and/or employees, and by reason of the unseaworthiness of the Tug ANABELLE V. ROEHRIG, plaintiff was caused to sustain injuries.

7. As a result of the foregoing, the plaintiff was rendered sick, sore, lame and disabled and sustained severe permanent personal injuries, was and is internally and externally disabled causing him to suffer pain, and for a time he was prevented from attending to his daily labors, thereby losing sums of money which he otherwise would have earned as wages, and has endeavored to be cured of his

injuries, and has expended sums of money to maintain himself, and will continue to endure pain and suffering, all to his damage.

8. By reason of the foregoing, plaintiff has been damaged in the sum of TWO MILLION FIVE HUNDRED THOUSAND (\$2,500,000.00) DOLLARS.

**SECOND COUNT AGAINST  
DEFENDANT TUG TILLY LLC**

9. Plaintiff repeats and realleges each and every allegation of the First Count in this Complaint as if fully set forth at length herein.

10. Upon information and belief, all times hereinafter mentioned, defendant TUG TILLY LLC was and still is a corporation, or other business organization, organized and existing under and by virtue of the laws of one of the States of the United States of America, and transacting business in the State of New York.

11. At all times and dates hereinafter mentioned, defendant TUG TILLY LLC owned the Tug ANABELLE V. ROEHRIG.

12. At all times and dates hereinafter mentioned, defendant TUG TILLY LLC operated the Tug ANABELLE V. ROEHRIG.

13. At all times and dates hereinafter mentioned, defendant TUG TILLY LLC controlled the Tug ANABELLE V. ROEHRIG.

14. That at all times and dates hereinafter mentioned, the plaintiff was a member of the crew of the Tug ANABELLE V. ROEHRIG and an employee of defendant TUG TILLY LLC.

15. That on or about February 1, 2005, without any fault on the part of the plaintiff, and wholly and solely by reason of the negligence, recklessness and carelessness of defendant TUG TILLY LLC and its agents, servants and/or employees, and by reason of the unseaworthiness of the Tug ANABELLE V. ROEHRIG, plaintiff was caused to sustain injuries.

16. As a result of the foregoing, the plaintiff was rendered sick, sore, lame and disabled and sustained severe permanent personal injuries, was and is internally and externally disabled causing him to suffer pain, and for a time he was prevented from attending to his daily labors, thereby losing sums of money which he otherwise would have earned as wages, and has endeavored to be cured of his injuries, and has expended sums of money to maintain himself, and will continue to endure pain and suffering, all to his damage.

17. By reason of the foregoing, plaintiff has been damaged in the sum of TWO MILLION FIVE HUNDRED THOUSAND (\$2,500,000.00) DOLLARS.

**THIRD COUNT AGAINST  
DEFENDANTS ROEHRIG MARITIME LLC  
AND TUG TILLY LLC**

18. Plaintiff repeats and realleges each and every allegation of the First and Second Counts in this Complaint as if fully set forth at length herein.

19. Plaintiff is entitled to maintenance, cure, and medical expenses for the period that he was disabled and unable to work in the total sum of TWO HUNDRED FIFTY THOUSAND (\$250,000.00) DOLLARS.

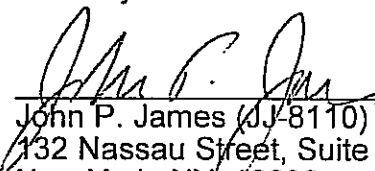
**WHEREFORE**, plaintiff, LARRY S. NELSON, SR. demands judgment against defendant ROEHRIG MARITIME LLC on the First Count in the amount of

TWO MILLION FIVE HUNDRED THOUSAND (\$2,500,000.00) DOLLARS; against defendant TUG TILLY LLC on the Second Count in the amount of TWO MILLION FIVE HUNDRED THOUSAND (\$2,500,000.00) DOLLARS; and against defendants ROEHRIG MARITIME LLC and TUG TILLY LLC on the Third Count in the amount of TWO HUNDRED FIFTY THOUSAND (\$250,000.00) DOLLARS, together with the costs, interest and disbursements of this action, and such other and further relief as this Court deems just and proper.

Dated: New York, New York  
June 25, 2007

**FRIEDMAN & JAMES LLP**  
Attorneys for Plaintiff

By:

  
\_\_\_\_\_  
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